



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT
DIRECTOR

May 15, 2014

Mr. Greg Sundstrom, City Manager
City of Grand Rapids
300 Monroe Avenue NW
Grand Rapids, Michigan 49503

Mr. Chip Richards and Mr. Chris Muller
Grand Rapids Whitewater
502 Second Street NW, Suite 300
Grand Rapids, Michigan 49504

Dear Mr. Sundstrom, Mr. Richards, and Mr. Muller:

SUBJECT: Restore the Rapids, City of Grand Rapids, Michigan

Thank you for giving the Department of Natural Resources (DNR), Fisheries Division, and the Department of Environmental Quality (DEQ), Water Resources Division, the opportunity to comment on the proposed Restore the Rapids project in the city of Grand Rapids, Kent County.

We have identified the following issues for this project to meet the stated goals of installing water quality and habitat enhancements; improving access and recreational opportunities for residents as well as enhancing natural aesthetics and riparian function of the riverfront:

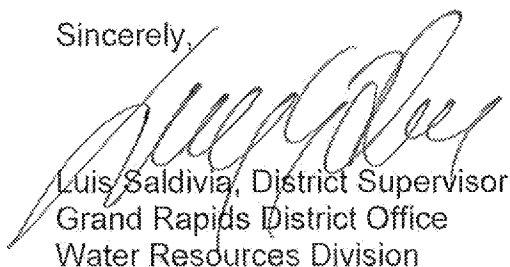
- Project Ownership – The city of Grand Rapids owns the 6th Street dam. The Restore the Rapids project involves modifications to the 6th Street dam, and the construction of a new lamprey barrier to be located approximately one mile upstream from the existing dam. Discussion on the ownership of a new or rehabilitated dam should take place in order to address all the inherent liability that this would represent such as safety, maintenance, flooding, lamprey escapement, recreational manipulation, etc.
- Fish Passage – The May 2013 Sea Lamprey Barrier Feasibility Study (Barrier Study) provided by Grand Rapids Whitewater states that the proposed modifications to the 6th Street dam may allow for upstream passage of all fish species; however, the Barrier Study does not address the specific fish passage options and methods. The proposed inflatable barrier has the potential to be a velocity barrier. All methods proposed should be designed to provide the same or better fish passage than is currently in place.
- Active Management of Adjustable Barrier – DNR policy requires that all in-stream barriers be operated as run-of-river facilities. Manipulation or augmentation of flow over the proposed adjustable weir may be contrary to agency policies and will need further discussion.

- Restoration of Stream Function – The primary goal of any stream construction project should be to restore stream function; that is, the river's physical, chemical, and biological processes. The Restore the Rapids project, as proposed thus far, provides little to no information regarding impacts on stream function, as well as how the project will impact threatened and endangered fish and mussel species.
- Flooding – Creating a new barrier upstream from the 6th Street dam and/or filling within the floodway of the Grand River may have an impact on upstream flood levels. Any proposed encroachments in the floodway will need to be hydraulically modeled. In order for new structures to be permitted under State of Michigan law and meet Federal Emergency Management Agency requirements, there can be no increase in flood levels on upstream properties. Complications with ice or mechanical failure of a new barrier could lead to additional flooding and will need to be modeled.

As the Restore the Rapids project becomes better defined, we may have additional comments. Staff from the DNR and DEQ would like to set up a meeting with representatives of the Restore the Rapids design team in order to discuss the issues raised above.

Thank you again for giving us the opportunity to be part of this important project, and we look forward to meeting with the design team in the future. If you have any questions, please contact me at 616-356-0208; saldivia@michigan.gov; or DEQ, Water Resources Division, Grand Rapids District Office, 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503-2341.

Sincerely,



Luis Saldivia, District Supervisor
Grand Rapids District Office
Water Resources Division

cc: Mr. Rodney Stokes, Special Advisor for City PlaceMaking, Office of the Governor
Mr. Jay Steffen, City of Grand Rapids
Ms. Suzanne Schulz, City of Grand Rapids
Ms. Wendy Ogilvie, Grand Valley Metro Council
Mr. Jason Carey, River Restoration
Mr. Mark Van Putten, Wege Foundation
Mr. Jim Dexter, DNR
Mr. Jay Wesley, DNR
Mr. William Creal, DEQ